

REMARKS

Applicant respectfully requests reconsideration of the present application and the consideration of the following remarks.

Claims 3-8, 11, 13-18, 21, 23-28 and 31 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication 2003/0074672 (hereinafter “Daniels”). Claims 9-10, 19-20 and 29-30 were rejected under 35 U.S.C. 103(a) as being unpatentable over Daniels in view of U.S. Patent 6,28,294 (hereinafter “Deo”). Claims 12, 22 and 32 were rejected under 35 U.S.C. 103(a) as being unpatentable over Daniels in view of U.S. Patent 6,473,097 (hereinafter “Elliott”). Claims 33-35 were rejected under 35 U.S.C. 103(a) as being unpatentable over Daniels in view of U.S. Patent 5,867,821 (hereinafter “Ballantyne”). Applicant respectfully disagrees.

Daniels was filed on December 11, 2002 as a *Continuation-in-part* application of U.S. Patent Application No. 09/886,695, filed on June 22, 2001, which is a *Continuation-in-part* application of U.S. Patent Application No. 09/787,683, filed on March 21, 2001 as national stage of international application No. PCT/US99/21900, filed on September 21, 1999.

Since Daniels was filed as a *Continuation-in-part* application, not all portions of the description of Daniels are entitled to an effective filing date earlier than December 11, 2002 or June 22, 2001. However, the present application was filed on March 13, 2001, which was earlier than the filing dates of Daniels and some of its parent applications. The *Continuation-in-part* applications involve newly added materials that were not supported by their parent applications. Thus, the description of Daniels relied upon by the Office Action may not have an effective filing date earlier than the filing date of the present application.

For example, page 9, paragraph 93 of Daniels was relied upon for the rejection of independent claims 3, 13 and 23. However, this paragraph appears to be absent from the parent application of Daniels that was filed earlier than the present application. Thus, the rejection of independent claims 3, 13 and 23 were improperly based at least partially on an improper reference. The rejections for the dependent claims of claims 3, 13 and 23 were also improperly for the same reason.

Since Daniels, as a *Continuation-in-part* application of a *Continuation-in-part* application, is substantially different from the corresponding parent application that has an effective filing date earlier than the present application, the rejections based on Daniels are improper. Thus, the withdrawal of the rejections under 35 U.S.C. 102(e) and 103(a) for claims 3-35 is respectfully requested.

Furthermore, even if Daniels were a proper reference, Daniels does not show each and every aspect of the invention as claimed in the independent claims. Daniels describes an entirely different system, in which a gateway device is used to provide *video signals* to the display devices, such as a composite video signal (see, e.g., page 8, paragraph 87, column 2, lines 31-38, Daniels). It is understood that video signals have a predetermined sizes. For example, NTSC TV standard has a predetermined size; HDTV has a predetermined size. It is understood that predetermined sizes of video frame images cannot accommodate web pages that are larger than the predetermined sizes.

Furthermore, Applicant respectfully submits that there is no prior art reference showing the evidence, motivation, and suggestion for scrolling video frames, such as TV video frames. Since the display devices of Daniels receive *video* signals tailored for the display devices, there would not be arrangement of scrolling “under exclusive control of” the display devices of Daniels.

For example, claim 3 recites:

3. (previously presented) A method to view Internet content, the method comprising:
- displaying in a first portion of a display of a device a user interface image including one or more buttons for web browsing;
- sending a request for a web page from the device to a remote server;
- receiving at the device from the remote server in a compressed format a web page image, the web page image being rendered at the remote server from the entire web page which the remote server retrieves from the Internet in response to the request, the web page including text and graphics; and
- under exclusive control of the device, selectively displaying a portion of the web page image in a second portion of the display of the device according a user input to the device while the user interface image is displayed in the first portion of the display.

Further, for example, claim 4 recites:

4. (previously presented) The method of claim 3, wherein said selectively displaying comprises:
- scrolling the web page image in the second portion of the display of the device at exclusive control of the device.

It appears that the Office Action relied upon the following description of Daniels for the additional limitation recited in claim 4.

“The grid coordinate can be determined from a "standard" origin, such as the top left corner of the webpage (the grid can be resized if the page is resized to accommodate page scrolling and resizing). The data that is transmitted between the wireless display terminal display and the gateway consists of video frame-type pages from the gateway to the wireless display terminal and

hyperlink grid coordinates from the wireless display terminal to the gateway.”
(Page 6, paragraph 77, lines 25-32, Daniels)

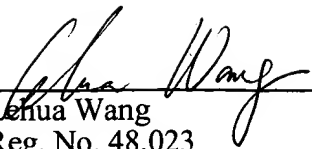
However, even if this description were supported by the earliest parent application of Daniels, this description of Daniels does not indicate “*scrolling* the web page image in the second portion of the display of the device *at exclusive control of the device*”. According to this description of Daniels, video frame-type pages are transmitted from the gateway to the wireless display terminal to accommodate page scrolling and resizing. It is understood that each of the video frame-type pages is a small portion of a web page. The wireless display terminal does not scroll each of the video frame-type pages. Instead, the gateway generates the corresponding video frame for the display terminal. The wireless display terminal of Daniels relies upon the gateway to generate video frames when page scrolling is needed. Note that claim 3 recites “the web page image being rendered at the remote server from *the entire web page* which the remote server retrieves from the Internet in response to the request, the web page including text and graphics”. Clearly, each of the video frame-type pages of Daniels does not correspond to “the web page image” recited in claims. Thus, even if Daniels were a proper reference, Daniels does not anticipate claim 4.

The rejections of the dependent claims relied upon the rejections for the claims discussed above. Thus, withdrawal of the rejections for the dependent claims is respectfully requested at least for the reasons discussed above.

Please charge any shortages or credit any overages to Deposit Account No. 02-2666. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

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